UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
FOUR PENN CENTER - 1600 JOHN F. KENNEDY BLVD.
PHILADELPHIA, PENNSYLVANIA 19103

VIA ELECTRONIC MAIL

David K. Orr Jr., Vice-President
Industraplate Corp.
5 James Court
Wilmington, DE 19801
davejr@industraplate.com

Re: Notice of Violation and Opportunity to Confer Clean Air Act - Industraplate Corp.

Dear Mr. Orr:

The U.S. Environmental Protection Agency (EPA) is issuing the enclosed Notice of Violation and Opportunity to Confer (NOVOC) to Industraplate Corp. (Industraplate) pursuant to Section 113(a) of the Clean Air Act (CAA), 42 U.S.C. § 7413(a). Based on information currently available, EPA finds that Industraplate is in violation of or has committed violations of the CAA, CAA implementing regulations including National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Plating and Polishing Operations, found at 40 C.F.R. Part 63, Subpart WWWWWW, and of program regulations approved as part of the Delaware State Implementation Plan at its facility located at 5 James Court in Wilmington, Delaware. Section 113(a) of the CAA, 42 U.S.C. § 7413(a), provides EPA with several enforcement options to resolve these violations.

By this letter, EPA is extending Industraplate an opportunity to discuss any further information EPA should consider with respect to the alleged violations identified in the enclosed NOVOC including any efforts Industraplate has taken to comply or prevent future noncompliance.

If Industraplate would like to arrange for a discussion. it should contact Stafford Stewart at (215) 814-5352 or Stewart.Stafford@epa.gov, or have its counsel contact Jennifer Abramson, Senior Assistant Counsel at (215) 814-2066 or Abramson.Jennifer@epa.gov, within **thirty (30) calendar days** following receipt of the enclosed NOVOC. EPA may pursue enforcement options if there is no response to the enclosed NOVOC.

Sincerely,

KAREN MELVIN

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Date: 2022.09.20 14:49:43 -04'00'

Karen Melvin, Director
Enforcement & Compliance Assurance Division

Enclosure: Notice of Violation and Opportunity to Confer

cc: Stafford Stewart, EPA Region 3 (Stewart.Stafford@epa.gov)
Jennifer Abramson, EPA Region 3 (Abramson.Jennifer@epa.gov)
Amy Mann, DNREC (Amy.Mann@delaware.gov)
Dave Orr, Sr. (daveorr@industraplate.com)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
FOUR PENN CENTER – 1600 JOHN F. KENNEDY BLVD.
PHILADELPHIA, PENNSYLVANIA 19103

IN THE MATTER OF:	:	**NOTICE OF VIOLATION AND OPPORTUNITY TO CONFER**
Industraplate Corp.	:	
5 James Court	:	**Docket No. CAA-003-2022-2004**
Wilmington, DE 19801	:	
	:	**Proceeding under Section 113(a) of the**
RESPONDENT.	:	**Clean Air Act, 42 U.S.C. § 7413(a)**

NOTICE OF VIOLATION AND OPPORTUNITY TO CONFER

This Notice of Violation and Opportunity to Confer (NOVOC) is issued pursuant to Sections 113(a)(1) and (3) of the Clean Air Act (CAA), as amended, 42 U.S.C. §7413(a)(1) and (3), to Industraplate Corp. (Industraplate) for alleged violations of the CAA, implementing regulations, including National Emissions Standards for Hazardous Air Pollutants: Area Source Standards for Plating and Polishing Operations set forth at 40 C.F.R. Part 63, Subpart WWWWWW, and of program regulations approved as part of the Delaware State Implementation Plan (SIP) at its facility located at 5 James Court in Wilmington, Delaware, as detailed in the paragraphs that follow.

I. STATUTORY AND REGULATORY BACKGROUND

1. Section 101 of the CAA, 42 U.S.C. § 7401, declares that the purpose of the Clean Air Act is to protect and enhance the quality of the nation's air resources so as to promote the public health and welfare and the productive capacity of its population.

Delaware SIP Approved Regulations, Minor Source Permits and Registrations

2. Section 108(a) of the CAA requires the Administrator of the EPA to identify and prepare air quality criteria for each air pollutant, emissions of which may endanger public health or welfare, and the presence of which results from numerous or diverse mobile or stationary sources (criteria pollutants). 42 U.S.C. § 7408(a).

3. For each criteria pollutant, Section 109 of the CAA requires the EPA to promulgate national ambient air quality standards (NAAQS) requisite to protect the public health and welfare. 42 U.S.C. § 7409.

4. Section 110(a) of the CAA, 42 U.S.C. § 7410(a), requires each state to adopt and submit to the Administrator of EPA for approval a plan which provides for implementation, maintenance, and enforcement, for each promulgated NAAQS, in each air quality control region (or portion thereof) within the state (SIP).

5. Each SIP must include enforceable emission limitations, among other control measures, and regulate the modification and construction of any stationary source within the areas covered by the plan as necessary to assure that NAAQS are attained and maintained. 42 U.S.C. § 7410(a)(2)(A).

6. Upon EPA approval, SIP requirements, including permits issued pursuant to SIP regulations approved by EPA, are federally enforceable under Section 113 of the CAA. 42 U.S.C. § 7413(a) and (b). 40 C.F.R. § 52.23.

7. Pursuant to Title 7, Chapter 60 of the Delaware Administrative Code,7 Del.C. Ch. 60, and Section 110 of the CAA, 42 U.S.C. § 7410, the State of Delaware adopted regulations that comprise the SIP for Delaware (DE SIP), which were approved by EPA as set forth in 40 C.F.R. § 52.420(c).

8. At all times relevant to the violations identified herein, state regulations governing the construction, installation, alteration or operation of any equipment, facility or control device that will emit or prevent the emission of an air contaminant and that is not subject to the State of Delaware's major source preconstruction review regulations, codified at 7 DE Admin. Code 1102 Permits, were approved by EPA as part of the DE SIP. 65 Fed Reg. 2,048 (January 13, 2000).

9. The State of Delaware Regulation No. 1102 Permit regulations require equipment that meets applicable emissions rates or standards in the DE SIP, and regulations issued pursuant to Sections 111 and 112 of the Clean Air Act, 42 U.S.C. §§ 7411 and 7412; that doesn't interfere with the State of Delaware's attainment or maintenance of ambient air quality standards or endanger the health, safety, and welfare of the people of the State of Delaware without an air contaminant control device; and that has actual emissions – either to the atmosphere or to the inlet of an air contaminant control device- of any air contaminant or contaminants, in the aggregate, during any day that are equal to or greater than 0.2 pounds per day and, during each and every day, that are less than 10 pounds per day, and that is not subject to the State of Delaware's major source preconstruction review regulations to be registered pursuant to Section 9.0. 7 DE Admin. Code 1102.9.1.

10. The State of Delaware Regulation No. 1102 Permit regulations require registrants to maintain records at the facility which document that the equipment has actual emissions - either to the atmosphere or to the inlet of an air contaminant control device - of any air contaminant or contaminants, in the aggregate, during any day that are equal to or greater than 0.2 pounds per day and, during each and every day, that are less than 10 pounds per day, and to make such records available upon request. 7 DE Admin. Code 1102.9.3.1.

11. The State of Delaware Regulation No. 1102 Permit regulations require equipment that has actual emissions - either to the atmosphere or to the inlet of an air contaminant control device - of any air contaminant or contaminants, in the aggregate, during each and every day that are less than 0.2 pounds per day to quantify and document actual emissions, maintain records and provide upon request documentation that the equipment qualifies for exemption from permitting and registration. 7 DE Admin. Code 1102.2.2.

12. The State of Delaware Regulation No. 1102 Permit regulations clarify that the submittal of a registration form does not relieve the registrant from the requirement to comply with all State and Federal requirements, including, but not limited to, monitoring, record keeping and reporting requirements, as well as any requirement to consider actual emissions or the potential to emit of all equipment when determining the applicability of or compliance with certain State and Federal requirements. 7 DE Admin. Code 1102.9.4.

National Emissions Standards for Hazardous Air Pollutants

13. Section 112(d) of the CAA, 42 U.S.C. § 7412(d), requires EPA to establish National Emission Standards for Hazardous Air Pollutants (NESHAP) for both major and area sources of hazardous air pollutants (HAP)[1] that are listed for regulation under Section 112(c) of the CAA, 42 U.S.C. § 7412(c).

14. Section 112(k)(3)(B) of the CAA, 42 U.S.C. § 7412(k)(3)(B), calls for EPA to identify at least 30 HAP which, as the result of emissions from area sources, pose the greatest threat to public health in the largest number of urban areas. EPA implemented this provision in 1999 in the Integrated Urban Air Toxics Strategy (64 FR 38715, July 19, 1999). Specifically, in the Strategy, EPA identified 30 HAP that pose the greatest potential health threat in urban areas, and these HAP are referred to as the ''30 urban HAP.''

15. Section 112(c)(3) of the CAA, 42 U.S.C. § 7412(c)(3), requires EPA to list sufficient categories or subcategories of area sources to ensure that area sources representing 90 percent of the emissions of the 30 urban HAP are subject to regulation. EPA implemented these requirements through the Integrated Urban Air Toxics Strategy (64 FR 38715, July 19, 1999). A primary goal of the Strategy is to achieve a 75 percent reduction in cancer incidence attributable to HAP emitted from stationary sources.

16. Pursuant to section 112(d)(5), 42 U.S.C. § 7412(d)(5), EPA, may elect to promulgate standards or requirements for area sources ''which provide for the use of generally available control technologies (GACT) or management practices by such sources to reduce emissions of hazardous air pollutants.''

17. EPA added plating and polishing operations to the Integrated Urban Air Toxics Strategy Area Source Category List on June 26, 2002 (67 FR 43113). EPA listed this source category for regulation pursuant to Section 112(c)(3) of the CAA, 42 U.S.C. § 7412(c)(3), based on emissions of compounds of five HAP metals: cadmium, chromium, lead, manganese, and nickel. These five metal HAP represent part of the 90 percent of those urban HAP emissions in the 1990 inventory to be regulated.

18. On July 1, 2008, EPA promulgated national emission standards for the control of HAP for the plating and polishing area source category, codified at 40 C.F.R Part 63, Subpart WWWWWW. These national emission standards include *inter alia* management practices for new and existing tanks, thermal spraying equipment, and mechanical polishing equipment in certain plating and polishing operations, and reflect EPA's determination of GACT and/or management practices for the plating and polishing area source category.

19. After the effective date of any emissions standard, limitation or regulation promulgated under Section 112 of the CAA, 42 U.S.C. § 7412, and applicable to a source, no person may operate such source in violation of such standard, limitation or regulation except, in the case of an existing source, which shall comply pursuant to the compliance dates set forth by EPA in the standard, limitation or regulation. Section 112(i)(3) of the CAA, 42 U.S.C. § 7412(i)(3).

[1] A major source emits or has the potential to emit 10 tons per year (tpy) or more of any single HAP or 25 tpy or more of any combination of HAP. An area source is a stationary source that is not a major source.

Area Source Standards for Plating and Polishing Operations
40 C.F.R. Part 63, Subpart WWWWWW

20. Effective July 1, 2008, EPA promulgated National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Plating and Polishing Operations, found at 40 C.F.R. Part 63, Subpart WWWWWW, 73 Fed. Reg. 37,741 (July 1, 2008) (NESAHP Subpart WWWWWW).

21. NESHAP Subpart WWWWWW applies to an owner or operator of a plant site that is engaged in electroplating (other than chromium electroplating), electroless or non-eletrolytic plating, dry mechanical polishing of finished metals and formed products after plating, electroforming, and/or electropolishing processes; that is an area source of HAP emissions; and that uses one or more plating and polishing metal HAP, including (except for lead) any of these metals in elemental form. 40 C.F.R. § 63.11504.

22. NESHAP WWWWWW applies, in relevant part, to the following affected sources: each tank that contains one or more of the plating and polishing metal HAP, and is used for non-chromium electroplating; electroforming; electropolishing; electroless plating or other non-electrolytic metal coating operations, such as chromate conversion coating, nickel; acetate sealing, sodium dichromate sealing, and manganese phosphate coating. 40 C.F.R. § 63.11505(a)(1).

23. NESHAP WWWWWW does not apply, in relevant part, to any plating or polishing process that does not use any material that contains cadmium, chromium, lead or nickel in amounts of 0.1 percent or more by weight, or that contains manganese in amounts of 1.0 percent or ore by weight, as reported on the Material Safety Data Sheet for the material. 40 C.F.R. § 63.11505(d)(6).

24. NESHAP Subpart WWWWWW defines terms as follows:

(a) *Dry mechanical polishing* means a process used for removing defects from and smoothing the surface of finished metals and formed products after plating with any of the plating and polishing metal HAP, as defined in this section, using hard-faced abrasive wheels or belts and where no liquids or fluids are used to trap the removed metal particles.
(b) *Electroforming* means an electrolytic process using or emitting any of the plating and polishing metal HAP, as defined in this section, that is used for fabricating metal parts. This process is essentially the same as electroplating except that the plated substrate (mandrel) is removed, leaving only the metal plate. In electroforming, the metal plate is self-supporting and generally thicker than in electroplating.
(c) *Electroless plating* means a nonelectrolytic process that uses or emits any of the plating and polishing metal HAP, as defined in this section, in which metallic ions in a plating bath or solution are reduced to form a metal coating at the surface of a catalytic substrate without the use of external electrical energy. Electroless plating is also called non-electrolytic plating. Examples include, but are not limited to, chromate conversion coating, nickel acetate sealing, sodium dichromate sealing, and manganese phosphate coating.
(d) *Electroplating* means an electrolytic process that uses or emits any of the plating and polishing metal HAP, as defined in this section, in which metal ions in solution are reduced onto the surface of the work piece (the cathode) via an electrical current. The metal ions in the solution are usually replenished by the dissolution of metal from solid metal anodes fabricated of the same metal being plated, or by direct replenishment of the solution with metal salts or oxides; electroplating is also called electrolytic plating.

(e) *Electropolishing* means an electrolytic process that uses or emits any of the plating and polishing metal HAP, as defined in this section, in which a work piece is attached to an anode immersed in a bath, and the metal substrate is dissolved electrolytically, thereby removing the surface contaminant; electropolishing is also called electrolytic polishing.

(f) *HAP* means hazardous air pollutant as defined from the list of 188 chemicals and compounds specified in the CAA Amendments of 1990; HAP are also called ''air toxics.'' The five plating and polishing metal HAP, as defined in this section, are on this list of 188 chemicals.

(g) *Non-electrolytic plating* means a process that uses or emits any of the plating and polishing metal HAP, as defined in this section, in which metallic ions in a plating bath or solution are reduced to form a metal coating at the surface of a catalytic substrate without the use of external electrical energy. Non-electrolytic plating is also called electroless plating. Examples include chromate conversion coating, nickel acetate sealing, sodium dichromate sealing, and manganese phosphate coating.

(h) *Plating and polishing metal HAP* means any compound of any of the following metals: cadmium, chromium, lead, manganese, and nickel, or any of these metals in the elemental form, with the exception of lead. Any material that does not contain cadmium, chromium, lead, or nickel in amounts greater than or equal to 0.1 percent by weight, and does not contain manganese in amounts greater than or equal to 1.0 percent by weight, as reported on the Material Safety Data Sheet for the material, is not considered to be a plating and polishing metal HAP.

40 C.F.R. § 63.11511.

25. NESHAP WWWWWW requires an owner or operator of an affected source to prepare an annual certification of compliance report according to 40 C.F.R. § 63.11509(c)(1) through (7) no later than January 31 of the year following the reporting year, and to keep each such report for a minimum of 5 years. 40 C.F.R. §§ 63.11509(c) and (f).

II. FACTUAL BACKGROUND

26. At all times relevant to the violations identified herein, Industraplate was a corporation registered in the State of Delaware. Industraplate has a principal place of business located at 5 James Court in Wilmington, Delaware.

27. At all times relevant to the violations identified herein, Industraplate owned and operated a metal coating facility located at located at 5 James Court in Wilmington, Delaware.

28. On February 5, 2007, the Delaware Department of Natural Resources & Environmental Control (DNREC) registered Industraplate's Sulfuric Anodizing Bath plating operation pursuant to the State of Delaware Regulation No. 1102, Section 9 (Registration Number: APC-2006/0190-R).

29. Prior to issuing Registration Number: APC-2006/0190-R, DNREC prepared a technical Memorandum dated January 31, 2007 which documented its efforts to obtain emissions and other information from Industraplate; its observations of various facility operations during an August 22, 2006 site visit; its potential to emit calculations for Industaplate's anodizing bath, nickel, cadmium, copper and sulfuric etch plating operations, based on data collected for 2005 and 2006, AP-42 emission factors (where available) and information collected during the site visit; and its conclusion that Industraplate's anodizing bath process has the potential to emit 0.63 lbs of sulfuric acid/day and therefor subject to

registration, and that each of its other plating operations has the potential to emit less than 0.2 lbs of air contaminants per day and therefore not subject to registration.

30. Pursuant to Registration Number: APC-2006/0190-R, records which document that the equipment meets the registration requirements shall be maintained at the facility and made available upon request.

31. As part of its investigation, EPA requested and received copies of Registration Number: APC-2006/0190-R as well as the supporting January 31, 2007 technical Memorandum prepared by DNREC.

32. On March 25, 2021, EPA issued an information request letter pursuant to Section 114(a) of the CAA, 42 U.S.C. § 7414(a), requiring Industraplate to, among other things, to:

(a) "[p]rovide a narrative on [its] current operations, including but not limited to, a description of all process vessels in use, storage tanks, electroplating operations, and whether there are any thermal spraying operations, or any batch electrolytic processes containing cadmium, chromium, lead, manganese or nickel";
(b) "[p]rovide a facility site plan which identifies each process unit, storage tank, and emission poino.";
(c) "[p]rovide records of actual emissions in lbs/day and tons/year" and "cumulative hours of operation per day" associated with its various processes, including the sulfuric anodizing bath and cadmium plating operations;
(d) "[p]rovide potential to emit for each emission source and the total facility in lb/day and ton/yr for voltile organic compounds (VOC), hazardous air pollutants (HAP) and nitrogen oxides (NOx)" as well as "examples of detailed calculations documenting how emission rates are obtained for each pollutant, include any emission factors used and the source of said factors";
(e) "[s]tate if there are any material stored or handles on site that contain 0.1% or greater by weight of cadmium, chromium, or lead as reported on the respective MSDS sheets";
(f) "[i]nclude a description of all management or work practices, including but not limited to, wet suppression systems, fume suppressants, and tank covers implemented to reduce fugitive emissions of any hazardous air pollutants (HAPS)"; and
(g) "[p]rovide "copies of the annual compliance certificates for hazardous air pollutants or any Notification of Compliance Status per 40 CFR § 63.11509(a)-(c)."

33. On or about May 7, 2021, Industraplate provided its response to the March 25, 2021 information request letter:

(a) providing a narrative stating that it is "qualified and approved to provide Anodize, Chromate/Non-chromate coating, Cadmium and Passivation" processes; and that its electrolytic processes are "Anodize and Cadmium ("Industraplate's plating and polishing operations");
(b) providing a site plan and tank list which identify the facility's storage tanks, some of which are used as part of Industraplate's plating and polishing operations and contain one or more of the plating and polishing metal HAP;
(c) failing to provide actual emission or cumulative hours of operation records for its various processes, including its sulfuric anodizing bath and cadmium plating operations;
(d) stating that the "Lead cathode inside anodize tank, Cadmium balls in cathodes inside the cad tank. Any extra material is stored in 5 gallon bucket in the boiler room" contain 0.1% or

greater by weight of cadmium, chromium, or lead as reported on the respective MSDS sheets;

(e) including the following description of its management or work practices: "Specialty Ano-Fume for anodize processes. All of Industraplate tanks and processes are covered when not in production with custom lids to fit. With the exception of the Cadmium tank which is covered during production and when not in production (closed system)"; and

(f) failing to provide any copies of annual compliance certificates for hazardous air pollutants or any Notifications of Compliance Status per 40 CFR § 63.11509(a)-(c).

III. VIOLATIONS

Failure to Maintain Records Documenting Eligibility for Registration and Registration Exemption

34. In 2007, it was determined that Industraplate's anodizing bath process had the potential to emit 0.63 lbs of sulfuric acid/day and was required to be registered pursuant to Section 9.0 of the State of Delaware Regulation No. 1102 Permit regulations.

35. Both the State of Delaware Regulation No. 1102 Permit regulations and Registration Number: APC-2006/0190-R require Industraplate to maintain records which document that its anodizing bath process equipment meets the registration requirements (i.e., has actual emissions of any air contaminant, or contaminants in the aggregate, that are equal to or greater than 0.2 pounds per day and, during each and every day, that are less than 10 pounds per day) and to make them available upon request. 7 DE Admin. Code 1102.9.3.1.

36. In 2007, it was also determined that Industraplate's other operations – including nickel, cadmium, copper and sulfuric etch plating operations - had the potential to emit less than 0.2 lbs of air contaminants per day and were not subject to registration.

37. The State of Delaware Regulation No. 1102 Permit regulations require Industraplate to quantify and document actual emissions, maintain records and provide upon request documentation that its unpermitted and unregistered equipment qualify for the exemption from permitting and registration (i.e., have actual emissions of any air contaminant, or contaminants in the aggregate, that are less than 0.2 pounds per day). 7 DE Admin. Code 1102.2.2.

38. By failing to maintain or to provide upon request records of actual emissions which document that its anodizing bath process equipment meets the registration requirements, or that its other unpermitted and unregistered equipment qualify the exemptions from permitting and registration since at least 2017, Industraplate violated 7 DE Admin. Code 1102.9.3.1., Registration Number: APC-2006/0190-R, 7 DE Admin. Code 1102.2.2., DE SIP, and 40 C.F.R. § 52.23.

Failure to Meet NESHAP WWWWWW Compliance Certification Requirements

39. Industraplate owns and operates a plant site that is an area source of HAP, and that is engaged in processes including Anodize and Cadmium electroplating, Chromate/Non-chromate coating and passivation electroless or non-eletrolytic plating, some or all of which use or emit compounds of cadmium, chromium, lead, manganese, or nickel, including (except for lead) any of these metals in elemental form.

40. Industraplate's plating and polishing operations include operations that use compounds that contain cadmium, chromium, lead, or nickel in amounts of 0.1 percent or more by weight, or manganese in amounts of 1.0 percent or more by weight, as reported on the Material Safety Data Sheet for the material.

41. Industraplate is subject to NESHAP WWWWWW.

42. Industraplate's plating and polishing operations include tanks, some of which contain one or more of the plating and polishing metal HAP and are thus affected sources pursuant to 40 C.F.R. § 63.11505(a)(1).

43. Since at least 2017, Industraplate failed to keep records of annual certifications of compliance as required by and in violation of Sections 63.11509(c) and (f) of NESHAP WWWWWW, and Section 112(i)(3) of the CAA, 42 U.S.C. § 7412(i)(3).

IV. ENFORCEMENT PROVISIONS

44. Sections 113(a)(1) and (3) of the CAA, 42 U.S.C. §§ 7413(a)(1) and (3), provide that the Administrator may take an enforcement action, whenever, on the basis of any information available to the Administrator and following thirty (30) day notice, the Administrator finds that any person has violated or is in violation of any requirement or prohibition of an applicable SIP or permit, the CAA, or implementing regulations including NESAHP Subpart WWWWWW.

45. Pursuant to Section 113(b) of the CAA, 42 U.S.C. § 7413(b), as amended by the Federal Civil 5Penalties Inflation Adjustment Act of 1990, 28 U.S.C. § 2461 and the Debt Collection Improvement Act, 31 U.S.C. § 3701 and 40 C.F.R. § 19.4, EPA may initiate a judicial enforcement action for a permanent or temporary injunction, and/or for a civil penalty of up to $109,024 per day for violations of the CAA that occurred after November 2, 2015, and where penalties are assessed on or after January 12, 2022.

46. The issuance of this NOVOC does not in any way limit or preclude the EPA from pursuing additional enforcement options from the investigation described in this NOVOC. This NOVOC does not preclude enforcement action for violations not specifically addressed in this NOVOC.

47. EPA is extending Industraplate an opportunity to discuss the alleged violations. Please reply within **thirty (30) calendar days** following receipt of this NOVOC to Stafford Stewart at (215) 814-5352 or Stewart.Stafford@epa.gov, or if Industraplate is represented by counsel, have its counsel reply to Jennifer Abramson, Senior Assistant Regional Counsel at (215) 814-2066 or Abramson.Jennifer@epa.gov, as to whether Industraplate would like to schedule such a conference call. EPA may pursue enforcement options if there is no response to this NOVOC.

KAREN MELVIN

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Karen Melvin, Director
Enforcement & Compliance Assurance Division